

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(RICHMOND DIVISION)

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF  
ELECTIONS, *et al.*,

Defendants.

Civil Action No. 3:14-cv-00852-REP-GBL-BMK

**DEFENDANT-INTERVENORS' PRETRIAL DISCLOSURES**

Defendant-Intervenors the Virginia House of Delegates and Virginia House of Delegates Speaker William J. Howell (“Defendant-Intervenors”), through their counsel, and pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, and the Initial Pretrial, Scheduling, and Discovery Order entered on March 2, 2015, hereby make their pretrial disclosures as follows:

**I. Trial Witnesses**

Defendant-Intervenors expect to call the following witnesses at trial:

- 7-8-15 + ✓ 1. Delegate Chris Jones – Mr. Jones is a member of the Virginia House of Delegates and was the architect of the redistricting plan at issue in this proceeding. He will testify about the plan and the 2011 redistricting process.
- 7-9-15 ✓ 2. Thomas Hofeller – Dr. Hofeller has been designated as an expert witness and will testify about the matters addressed in his expert report.
- 7-9-15 ✓ 3. ✓ Trey Hood – Dr. Hood has been designated as an expert witness and will testify about the matters addressed in his expert report. *Timothy Hood, III*
- 7-9-15 ✓ 4.2. Jonathan Katz – Dr. Katz has been designated as an expert witness and will testify about the matters addressed in his expert report.

Defendant-Intervenors’ submit this list of witnesses without waiving any of their rights, and specifically reserve the right to call any rebuttal or impeachment witnesses and to